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March 18, 2025

**Via ECF**

The Honorable Christine P. O'Hearn  
Mitchell H. Cohen Building & U.S. Courthouse  
United States District Court for the  
District of New Jersey  
4<sup>th</sup> & Cooper Streets, Room 1050  
Camden, NJ 08101

**Re: Ireland & Bade v. Hegseth, et al.**  
**Civ. A. No. 25-1918-CPO-AMD**

Dear Judge O'Hearn,

This law firm, along with Langer Grogan Diver, P.C., GLBTQ Legal Advocates & Defenders, and the National Center for Lesbian Rights, represent Plaintiffs Logan Ireland and Nicholas Bear Bade in the above-referenced matter, which we commenced yesterday by a Verified Complaint. A few minutes ago, Plaintiffs filed for an order to show cause why a temporary restraining order should not be issued.

We write briefly to summarize the immediate request pending before the Court. A copy of this letter is being sent to counsel for Defendants.

If granted, the narrow order would temporarily restrain Defendants from initiating administrative separation proceedings against Plaintiffs Ireland and Bade, two highly decorated servicemembers of the United States Air Force, from the United States military. In the absence of judicial intervention, they stand to be separated (*i.e.*, essentially fired) as of March 26, 2025, merely because they are transgender men.

As set forth in the proposed Order to Show Cause, Plaintiffs respectfully request that the Court hold a hearing on the request for a temporary restraining order with sufficient time for the Court to rule on the request by March 24, 2025, thereby enabling the parties to obtain clarity prior to the threatened administrative separation date of March 26, 2025.

Plaintiffs' request for a temporary restraining order is with notice to Defendants. Specifically, Plaintiffs' counsel provided an email copy of the Verified Complaint to three counsel from the U.S. Department of Justice who already are counsel for the defendants in

*Talbott v. Trump*, No. 25-cv-240 (D.D.C.), which concerns a request for a nationwide injunction regarding the same transgender service ban. Further, our office spoke with a Deputy Chief of the Civil Division of the United States Attorney's Office for the District of New Jersey this morning to inform the Office of the Verified Complaint and the request for a temporary restraining order, and at their request, are emailing copies of today's filings to them.

In the meantime, should the United States District Court for the District of Columbia take any action affecting Plaintiffs or the proceedings before this Court, we will inform the Court.

Finally, due to both the exigency of the situation and for the sake of efficiency, we created a database housing electronic copies of exhibits in support of the temporary restraining order, a link to which appears in the Declaration of John S. Stapleton (Dkt. 4-2). Should the Court prefer hardcopies of the documents, we will deliver them to the Court as soon as possible.

Thank you for Your Honor's attention to this matter.

Respectfully,



John S. Stapleton